

# **Exhibit B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 24-cv-4775 (ER)

JANE DOE 200,

Plaintiff,

vs.

DARREN K. INDYKE AND RICHARD  
D. KAHN AS CO-EXECUTORS OF  
THE ESTATE OF JEFFREY E. EPSTEIN,

Defendant.

**PLAINTIFF, JANE DOE 200'S, NOTICE OF INTENT TO SERVE SUBPOENA  
UPON THIRD PARTY DARREN K. INDYKE**

PLEASE TAKE NOTICE that pursuant to Rule 45 of the Federal Rules of Civil Procedure, the Plaintiff, Jane Doe 200, by and through her undersigned counsel of record, intends to serve a Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action ("Subpoena") upon third party, Darren K. Indyke. A copy of the Subpoena is attached hereto as Exhibit A.

Dated: February 25, 2025

Respectfully Submitted,  
EDWARDS HENDERSON, PLLC  
By: /s/ Bradley J. Edwards  
Bradley J. Edwards  
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[brittany@cylvf.com](mailto:brittany@cylvf.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2025, a true and correct copy of the above and foregoing *Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action* (“*Subpoena*”) has been served by email upon counsel of record in the above-captioned action.

/s/ Bradley Edwards  
Bradley J. Edwards

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*Attorneys for Defendant Darren K. Indyke,  
in his capacity as the Executor for the  
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*Attorneys for Defendant Darren K. Indyke, in  
his capacity as Co-Executor for the Estate of  
Jeffrey E. Epstein*

# **EXHIBIT**

# **A**

## UNITED STATES DISTRICT COURT

for the

Southern District of New York

Jane Doe 200

*Plaintiff*

v.

Darren K. Indyke and Richard D. Kahn, et. al.

*Defendant*

Civil Action No. 24-cv-4775 (ER)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Darren K. Indyke

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Schedule A attached.

Place: Edwards Henderson  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301

Date and Time:

03/19/2025 3:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/25/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ Bradley J. Edwards

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Jane Doe 200 Plaintiff, who issues or requests this subpoena, are:

Bradley J. Edwards, 425 N. Andrews Ave., #2, Ft. Lauderdale, FL 33301, brad@cvlf.com, brittany@cvlf.com, 954-524-2820

## Notice to the person who issues or requests this subpoena

A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 24-cv-4775 (ER)

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
 on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
 \_\_\_\_\_.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
 \$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
 \_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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vs.

DARREN K. INDYKE AND RICHARD  
D. KAHN AS CO-EXECUTORS OF  
THE ESTATE OF JEFFREY E. EPSTEIN,

Defendant.

**SCHEDULE A TO SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR  
OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION  
DIRECTED TO DARREN INDYKE**

1. All emails or other correspondence sent by you or anyone in your office, Darren K. Indyke PLLC, related to Jane Doe 200.
2. All emails or correspondence received by you or anyone in your office, Darren K. Indyke PLLC, related to Jane Doe 200.
3. All documents or communications exchanged between You and Jeffrey Epstein discussing claims of sexual assault, rape, and/or concealment of the same.
4. All documents or communications exchanged between You and Lesley Groff discussing claims of sexual assault by Jeffrey Epstein and/or concealment of the same.
5. All documents or communications exchanged between You and Bella Klein discussing claims of sexual assault by Jeffrey Epstein and/or concealment of the same.
6. All documents or communications exchanged between You and Richard Khan discussing claims of sexual assault by Jeffrey Epstein and/or concealment of the same.
7. All documents or communications exchanged between You and Richard Khan discussing allegations of sexual abuse by Jeffrey Epstein.

8. All documents or communications exchanged between You and Richard Khan discussing the settlement of any sexual abuse claims against Jeffrey Epstein or the Estate of Jeffrey Epstein.
9. All documents or communications evidencing payments made to You by the Estate of Jeffrey Epstein.
10. All documents or communications evidencing the beneficiaries of Jeffrey Epstein's 1953 Trust.
11. All documents or communications identifying You as a beneficiary of Jeffrey Epstein's Estate.